

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR ADMISSIONS,
INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH CAROLINA et
al.,**

Defendants.

**DECLARATION OF THOMAS
MCCARTHY IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL
PRODUCTION OF STUDENT
PERFORMANCE DATA**

I Thomas R. McCarthy, being over 18 years of age and fully competent to make this declaration, declare the following pursuant to 28 U.S.C. 1746:

1. Attached as Exhibit A are true and accurate excerpts from a document that Defendants produced bearing Bates numbers UNC0124078-153.
2. Attached as Exhibit B is a true and accurate copy of a document that Defendants produced bearing Bates numbers UNC0097418-46
3. Attached as Exhibit C is a true and accurate copy of Plaintiff's First Request for Production of Documents, dated May 21, 2015.

4. Attached as Exhibit D is true and accurate copy of Defendants' Responses and Objections to Plaintiff's First Set of Document Requests, dated July 29, 2015.
5. Attached as Exhibit E is a true and accurate copy of Plaintiff's Second Request for Production of Documents.
6. Attached as Exhibit F are true and accurate excerpts from a document that Defendants produced bearing Bates numbers UNC0124154-93.
7. Attached as Exhibit G is a true and accurate copy of the Provost's Minority Male Workgroup: Recommendation Report, which Defendants produced to Plaintiff without Bates stamping.
8. Attached as Exhibit H is a true and accurate copy of a document that Defendants produced bearing Bates number UNC0109850.
9. Attached as Exhibit I is a true and accurate copy of a document that Defendants produced bearing Bates numbers UNC0326431-42.
10. Attached as Exhibit J is a true and accurate copy of a document that Defendants produced bearing Bates numbers UNC0140268-71.
11. Attached as Exhibit K are true and accurate excerpts of the final report of Kenneth Wainstein, which outlines the "Paper Classes" controversy at UNC-Chapel Hill.

12. Attached as Exhibit L are true and accurate excerpts from the transcript of Jennifer Kretchmar's deposition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 9, 2017

/s/ Alan M. Ruley
Alan M. Ruley